

EXHIBIT 111
Unredacted Version of
Document Sought to be Sealed

From: Machin, Amanda C. <AMachin@gibsondunn.com>
Sent: Friday, May 6, 2022 6:05 PM
To: Emma Wright; *** Service-FB-CA_MDL
Cc: Lesley Weaver; Derek Loeser; Cari Laufenberg; Matt Melamed; Josh Samra; Anne Davis; David Ko
Subject: RE: Privilege Log -- RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation
Attachments: 2022.05.06 Fourth Amended Privilege Log_Sample_Additional Information.xlsx;
2022.05.06 Fourth Amended Privilege Log_Sample_De-designated Documents.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Counsel,

We are writing in reply to your April 29, 2022 letter responding to certain entries on Facebook's Fourth Amended Categorical Privilege Log. Pursuant to Paragraph 5 of the Stipulation and Order Regarding Facebook's Categorical Privilege Log, Facebook is informing Plaintiffs that it will produce certain documents in the Samples, which are included in the attached Excel spreadsheet entitled 2022.05.06 Fourth Amended Privilege Log_Sample_De-designated Documents. We are also providing additional information about certain other documents in the log, which can be found in the attached Excel spreadsheet entitled 2022.05.06 Fourth Amended Privilege Log_Sample_Additional Information.

Facebook will conduct a further review to identify additional documents, if any, on its privilege log which were withheld on the same or substantially similar bases as the documents being removed from the privilege log today. We will produce any documents from that review that we determine should be de-designated to Plaintiffs as soon as possible.

Please let us know if you have any questions.

Amanda

Amanda C. Machin
Of Counsel

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From: Emma Wright <ewright@kellerrohrback.com>
Sent: Thursday, May 5, 2022 2:50 PM
To: Machin, Amanda C. <AMachin@gibsondunn.com>; *** Service-FB-CA_MDL <Service-FB-CA_MDL@gibsondunn.com>
Cc: Lesley Weaver <lweaver@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Josh Samra <jsamra@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; David Ko <dco@KellerRohrback.com>
Subject: RE: Privilege Log -- RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation

[WARNING: External Email]

Great, thanks so much.

From: Machin, Amanda C. <AMachin@gibsondunn.com>

Sent: Thursday, May 5, 2022 11:48 AM

To: Emma Wright <ewright@kellerrohrback.com>; *** Service-FB-CA_MDL <Service-FB-CA_MDL@gibsondunn.com>

Cc: Lesley Weaver <lweaver@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Josh Samra <jsamra@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; David Ko <dko@KellerRohrback.com>

Subject: RE: Privilege Log -- RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation

Thanks for confirming we can use that feature going forward, Emma.

Here are the Bates numbers for those docs:

Priv Log ID Bates

FB-MDL-PRIV-00026266 FB-CA-MDL-03080412

FB-MDL-PRIV-00065814 FB-CA-MDL-03079820

FB-MDL-PRIV-00108524 FB-CA-MDL-03078919

FB-MDL-PRIV-00168269 FB-CA-MDL-03080530

Amanda C. Machin
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From: Emma Wright <ewright@kellerrohrback.com>

Sent: Thursday, May 5, 2022 2:37 PM

To: Machin, Amanda C. <AMachin@gibsondunn.com>; *** Service-FB-CA_MDL <Service-FB-CA_MDL@gibsondunn.com>

Cc: Lesley Weaver <lweaver@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Josh Samra <jsamra@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; David Ko <dko@KellerRohrback.com>

Subject: RE: Privilege Log -- RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation

[WARNING: External Email]

Amanda,

Thanks so much for providing the random sample; Plaintiffs approve the use of the Excel random number generator function for the purposes of developing this sample and future samples unless otherwise noted.

Additionally, I wanted to check in on the following four documents that got missed in Facebook's April 22 production to see if they've subsequently been produced and, if so, what their production Bates numbers are: FB-MDL-PRIV-00026266; FB-MDL-PRIV-00065814; FB-MDL-PRIV-00108524; FB-MDL-PRIV-00168269.

Thank you,
Emma

From: Machin, Amanda C. <AMachin@gibsondunn.com>
Sent: Monday, May 2, 2022 11:37 AM
To: Emma Wright <ewright@kellerrohrback.com>; *** Service-FB-CA_MDL <Service-FB-CA_MDL@gibsondunn.com>
Cc: Lesley Weaver <lweaver@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Josh Samra <jsamra@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; David Ko <dko@KellerRohrback.com>
Subject: Privilege Log -- RE: In re Facebook, Inc. Consumer Privacy User Profile Litigation

Emma,

I am confirming receipt of your letter; we will respond by May 6.

As you know, the protocol we agreed to requires the parties to use a random number generator to create a statistically significant sample, not to exceed 385 documents, of documents which fall within each challenge. Using the random number generator function available in Excel, we have identified the documents in the attached spreadsheet, which will constitute the Samples.

Amanda

Amanda C. Machin
Of Counsel

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From: Emma Wright <ewright@kellerrohrback.com>
Sent: Friday, April 29, 2022 9:42 PM
To: Machin, Amanda C. <AMachin@gibsondunn.com>; *** Service-FB-CA_MDL <Service-FB-CA_MDL@gibsondunn.com>
Cc: Lesley Weaver <lweaver@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Josh Samra <jsamra@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; David Ko <dko@KellerRohrback.com>
Subject: [WARNING: UNSCANNABLE EXTRACTION FAILED]In re Facebook, Inc. Consumer Privacy User Profile Litigation

[WARNING: External Email]

Counsel:

Please see the attached letter and response to entries on Facebook's Fourth Amended Categorical Privilege Log.

Regards,

Emma

Emma Wright
Keller Rohrback L.L.P.

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Pronouns: she/her

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